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217602

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423-0001



Re: STB Ex Parte No. 646 (Sub-No. 1) – Simplified Standards
For Rail Rate Cases

Dear Secretary Williams:

Union Pacific Railroad Company (“UP”) shares the concerns that have been expressed by other railroads about the possible disclosure Waybill Sample data in response to the request by The National Industrial Transportation League (“NITL”) for the workpapers underlying the Board’s July 28, 2006 Decision.

If the Board produces Waybill Sample data in response to NITL’s request, it should apply the same procedures, conditions, and restrictions that it would have applied had NITL made a formal request for Waybill Sample data under 49 C.F.R. § 1244.9.

Thank you for your attention to this matter.

Sincerely,

Michael L. Rosenthal

*Counsel for Union Pacific
Railroad Company*

cc: Parties of Record

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